

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF OKLAHOMA**

In Re:	)	
	)	Case No. 09-82127-TC
STITH, CHRISTOPHER LYNN And	)	
KRISTIE DIONNE,	)	Chapter 7
	)	
Debtor(s).	)	

**MOTION FOR AUTHORITY TO SELL PROPERTY  
OF THE ESTATE AND NOTICE OF PROPOSED SALE**

COMES NOW Charles Greenough, Trustee, and for his Motion for Authority to Sell Property of the Estate and Notice of Proposed Sale, states as follows:

1. The Debtors filed their Voluntary Chapter 7 Petition on December 8, 2009, in the Eastern District of Oklahoma.

2. The Bankruptcy Estate includes the following described property, to wit:

A. Twenty percent (20%) membership interest in Knuckles Pub at Bell St. Brickhouse, LLC

[hereinafter the "Property"].

3. The Trustee proposes to sell the Property at to Sam Bullock, owner of sixty percent (60%) of said LLC for a total purchase price of \$12,500.00 via private sale.

4. The Trustee submits that said private sale is in the best interest of the Estate because the minority LLC interest being sold is difficult to market to any party other than another member of the LLC, due to restrictions on transfer contained in the agreements governing said LLC and also due to the fact that third parties are unlikely to be interested in purchasing a minority interest in a privately held LLC.

5. Notice is hereby given to all interested parties that Trustee herein, pursuant to Bankruptcy Rules 2002 (a)(2) and 6004 (a)(e)(1), proposes to sell, other than

in the ordinary course of business, the Property as herein described on or after August 7, 2011.

Any party willing to submit a higher offer for the Property shall be required to submit a binding offer on the same terms and conditions no later than five (5) days prior to the hearing scheduled for this Motion.

WHEREFORE, the Trustee applies to the Court for an Order authorizing him to sell the Property on or after August 7, 2011. Notice of the proposed sale is hereby given to all interested parties.

/s/Charles Greenough

Charles Greenough, OBA #12311

McAFEE & TAFT

A Professional Corporation

1717 South Boulder, Suite 900

Tulsa, OK 74119

Phone: (918) 587-0000

Fax: (918) 599-9317

[charles.greenough@mcafeetaft.com](mailto:charles.greenough@mcafeetaft.com)